

July 23, 2012

Bob Zeigler
SEPA/NEPA Coordinator
WDFW Regulatory Services Section
600 Capitol Way N
Olympia, WA 98501-1091

RE: DNS #12-052 Whiskey Dick Road Improvement

Mr. Zeigler,

First of all, I wonder if Ms. Kristen Kuykendall (SEPA applicant) has ever been on this road. The Whiskey Dick Ridge road is no better or worse than other roads on WLA.

Both Ms. Kuykendall and an equipment operator from the WDFW Construction crew conducted site visits prior to drafting the scope of work.

This road was not selected for improvement based on its quality of being more or less rough, but for being a road that 1) is the primary southern access into the Whiskey Dick Wildlife Area, 2) ties in to Kohler Spring, which is a popular destination for hunters and recreationists, and 3) provides connectivity to other Green Dot roads. Improvements to this road were also recommended by the Citizen Advisory Group (CAG).

REF: The Environmental Checklist

A. BACKGROUND

11. The majority of Whiskey Dick Ridge road is on very steep side hills. Cutting into the up hill side to make the 12 ft road bed (which actually turns out to be 20 ft with the shoulder and ditch) will expose a large amount of bare soil that can be seen for miles and be an attractant for weeds. Re-vegetation is very expensive and time intensive.

The road already exists, most sections at a width of 10 feet or greater, and very few sections have steep cut slopes directly above. Only the more dangerous sections of road are being targeted for improvement, not the entire length. The road is steeply out-sloped in a few locations so improvement will entail using rock to lift the outer edge, and seldom if ever, cut into an existing up-slope. The majority of the road will be left slightly out-sloped or have water bars and rolling dips to address run-off, therefore will not require a full-length side ditch.

12. Section 7 in T17N; R22E was omitted.

Project legal description: road length that runs through portions of T17-R21-Sec 11, 12, 14; T17-R22-Sec 4, 7, 8, 9; and T18-R22-Sec 35.

B. ENVIRONMENTAL ELEMENTS

1. Earth

e. “Up to 100 CY of crushed rock may be hauled in to cover dusty areas.” 100 CY (12” wide and 12” deep) will cover approximately 227 ft.

The crushed rock that will be brought in will be used in addition to local rock, which will be available as a result of the project. Fill from water bars will be placed in the road, and rocky spurs will be removed and the broken rock will be used on site.

3. Water

a. (1 & 2) Talk about work to be done on the Whiskey Dick Creek road. This SEPA is supposed to deal with the Whiskey Dick Ridge road only.

The Creek Road aspect of the project was removed, but the SEPA language was not updated to correctly reflect this change in scope. The Ridge Road SEPA document will be updated to reflect that only improvements to the Ridge Road are part of the project.

4. Plants

a. There are no deciduous trees on or near the Whiskey Dick Ridge road.

See response to 3. above.

b. Willows and wild rose will not grow on the ridge top without an artificial water source.

See response to 3. above.

5. Animals

b. The only documented Upper Columbia River Steelhead are near the mouth of the creek in the Columbia River. Upper Whiskey Dick Creek is dry except for one crossing.

See response to 3. above.

d. Why would the WDFW want to improve the ridge road and increase traffic?

This is actually two separate questions. Improvements are not proposed for the purpose of increasing traffic, but to apply allocated road improvement funding. The Ridge Road has several sections that are dangerously out-sloped, and while the clay soils are navigable in dry conditions, they become very slick and dangerous when wet. The road will not be improved to a quality that will make it comfortable for sedans or large RVs to travel, so an increase in non-traditional users is not expected, nor is it being promoted.

The proposal to close the Whiskey Dick Creek Road has been in the Wildlife Area Management Plan since 2006. When closure of the Creek Road was first proposed, the idea was taken to the Citizen Advisory Group (CAG) for public review. Excerpt from the 11-21-06 CAG meeting notes: “Bill Essman expressed support for the proposed changes,

but said he expected resistance by the public (regular users), particularly with regard to closures of portions of Quilomene Bay and Whiskey Dick Creek Roads.”

Excerpt from the follow-up Bill Essman memo titled ROAD CLOSURES ON WDFW WHISKEY DICK, QUILOMENE, SKOOKUMCHUCK & COLOCKUM WLA's: “We support closure of the Whiskey Dick Creek Road from T17N;R21E;S12 to T17H;R22E;S4 (intersection with the Pump House Road), **IF IMPROVEMENTS ARE MADE TO THE RIDGE ROAD.”**

In 2011, capital funds were allocated to “Improve Roads in the Whiskey Dick Wildlife Area” therefore the Whiskey Dick road project identified in the Wildlife Area Management Plan was selected for implementation. However, a recent cooperative planning effort has just begun to evaluate recreation management in the Naneum Basin and the Colockum, Quilomene, and Whiskey Dick wildlife areas. This process is currently underway, and incorporates input from a 15-member citizen panel including members from Rocky Mountain Elk Foundation (RMEF), Kittitas Field and Stream Club, Wenatchee Sportsmen, and numerous other recreational interest groups. WDFW opted to let the Whiskey Dick Creek Road closure decision be evaluated as part of the recreation planning process, but opted to move forward with improving the Whiskey Dick Ridge Road since it would be a public benefit even if the Creek Road project was not implemented.

8. Land and shoreline use

e. This area is zoned AGRICULRURE/COMMERCIAL by Kittitas County.

10. Aesthetics

b. The scars on the side hills will be visible for miles.

The road already exists, and planned improvements are not expected to cause significant changes to its appearance on the landscape.

c. Re-seeding with native vegetation is very expensive. The success of reseeding on a basalt ridge is very unlikely.

Most work will occur within the road prism where vegetation is not desirable, so the extent of necessary restoration will be limited. Where seeding is needed, site-appropriate native species will be used to improve the likelihood of success.

14. Transportation

f. Why would the WDFW want to increase vehicle traffic on ridge tops, when some biologists are concerned about disturbing elk?

See response to 5. d, paragraph 1, above.

WDFW does not want to increase vehicle traffic on ridge tops. As stated in the SEPA document “No new traffic is expected to occur after project completion.”

Any road will cause disturbance, so land managers aim to locate roads in areas that cause the least amount of disturbance while still allowing public access. The Ridge Road creates less wildlife/habitat impacts than the Creek Road. There has been a temporary closure to winter motorized travel along this stretch of road for the past few years to reduce elk disturbance, but whether the closure continues or not, the road still needs improvement.

The DNS states that: “This project addresses the improvement of the ridge road only,…” But on map sheet 3 of 6, Point #903, 904, 905 are not crossed out and Point #900, 901, 902 and the road block are. If this project deals to improvement on the ridge road only, shouldn't they all be removed?

See response to 3. above.

At what point does benefit vs. cost come into play? WDFW has never done any maintenance on any of these roads in the past and why would this road be different from any other? Will upgrading and maintenance occur on all of these roads?

WDFW prioritizes spending toward fish and wildlife-specific issues, and road improvements have not often ranked high enough to leverage funds in the past. However, capital funds were recently allocated for improvement of Whiskey Dick W.A. roads, so the funding was applied to a project that has been in the Wildlife Area Management Plan for years. Further road work will continue as funding becomes available.

Road Maintenance and Abandonment Plans (RMAP) were established in 2003 by legislative order, which require landowners to address water quality issues on forest roads by 2015. WDFW was able to leverage funding to complete RMAP work, and once those issues are addressed, the agency will seek funding to apply similar standards to roads in shrub-steppe habitats.

Thank you for the opportunity to comment.

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